

# EXHIBIT A

## **Expert Witness Report of Trevor Petersen in the Matter of**

### **Josh Chatwin v. Draper City et al**

#### **I. Statement of the Assignment**

I have been retained to perform an evaluation of facts, and evidence and offer opinions regarding the actions of the Defendants which pertain to the Use of Force towards the Plaintiff, as well as, respond to proper training procedures, weapon retention, arrest control tactics, and safety considerations;

- 1) Whether Officer Patterson used proper force and adequate procedures designed to ensure the safety of the officers and arrestee
- 2) Whether Officer Patterson used excessive force under the circumstances present.
- 3) Did Draper City provide adequate training and procedures when interacting with intoxicated subjects.

My opinions expressed herein are based upon my examination of the materials itemized in Section III, and I reserve the right to revise my opinions if new information comes to light. I am being compensated at a rate of \$150 per hour for all tasks performed in connection with this matter.

#### **II. Background and Qualifications**

I completed my Category I Law Enforcement Officer (LEO) certification from the Utah Police Officer Standards and Training (POST) in 2000. After receiving my LEO certification, I was employed by the Utah State Parks and Recreation. Where I provided marine enforcement on Lake Powell in Utah.

Following my employment with the Utah State Parks and Recreation, I was employed by the Kane County Sheriff's Office as a narcotic agent. I worked several years as an undercover agent, posing as a student, in several high schools in Utah. I also worked as an investigative agent investigating cases involving the manufacturing, trafficking, distribution, and use of controlled substances. I worked with local, state, and federal law enforcement.

After my employment with the Kane County Sheriff's Office, I was employed with the Weber County Sheriff's Office. I served in many capacities during my employment which included; patrol, Field Training Officer (FTO), SWAT, less-lethal weapons/chemical munitions instructor, firearms instructor, gang /organized crime investigator, homicide investigator, Use of Force committee member (Weber County Sheriff's Office), criminal intelligence, financial crime investigator, Internet Crimes Against Children (ICAC) investigator, and Utah (POST) police academy instructor. During this time, I also instructed

many law enforcement related courses involving cyber crimes and digital forensics, crimes in progress, vehicle searches, felony stops, active shooter, hostage rescue, rappelling, weapons retention, decision making, firearms safety and marksmanship, less-lethal munitions deployment, and arrest control. I drafted department policy and procedures regarding financial and Internet crimes. In the course of my employment over the years, I have written, drafted, and instructed training and policies designed to ensure the safety of a law enforcement officer, arrestee, and citizens. I also conducted training classes involving the use of force involving individuals under the influence of alcohol. I currently hold instructor certifications with the Federal Bureau of Investigations (FBI) and the National Tactical Officer's Association (NTOA).

After my employment with the Weber County Sheriff's Office, I was employed with the Engility Corporation. I served as a Law Enforcement Professional (LEP) in Afghanistan. I trained the Afghanistan National Police (ANP) and coalition forces on law enforcement related subjects, including but not limited to; firearms safety and marksmanship, tactical questioning, battle damage assessments, post Improvised Explosive Device (IED) blast assessments, post mortem DNA and fingerprint collection/Enemy Killed In Action (EKIA) identification, detainee operations, investigation techniques, and digital forensics/biometrics. During my time in Afghanistan, I instructed and certified coalition forces on the use of less lethal munitions and use of force.

After my employment with the Engility Corporation, I was employed with DynCorp International. I served as a Police Advisor working with the United States Department of State and the United Nations in Haiti. I served as the assistant team leader for the United Nations Special Weapons And Tactics (SWAT) unit. I provided training and oversight of the Haitian and Jordanian SWAT teams. I trained and evaluated the SWAT teams on subjects, including but not limited to; firearms safety and marksmanship, arrest control tactics, use of force, human rights violations, hostage rescue, rappelling, physical fitness, street survival, vehicle assaults, open area searches, dynamic entry techniques, detainee operations, and community policing.

### **III. Publications and Expert Testimony**

During the course of my career, I have not commercially published anything and I have not testified in a deposition, court hearing, or any civil hearing, as an expert witness. I have drafted, published, and demonstrated several training presentations and department policies and procedures, such as:

- a) (ISEE) Identifying & Seizing Electronic Evidence Training Power Point- December 2011
- b) (ICAC) Internet Crimes Against Children Awareness Video- April 2011
- c) Financial Crimes Training Power Point- April 2010
- d) Robbery Training Power Point- October 2009
- e) Weber Metro SWAT Less Lethal Training Power Point- August 2011
- f) Identity Crimes Policy and Procedure (Weber County Sheriff's Office) April 2008

#### **IV. Materials Examined**

I have reviewed:

- a) The complaint in Chatwin v. Draper City et al
- b) The deposition of Officer Joshua Patterson
- c) The deposition of Officer David Harris
- d) The deposition of Officer Heather Baugh
- e) Witness statement of Kathy Torrence
- f) Preliminary Hearing testimony Kathy Torrence
- g) Witness statement of Mehdi Mahmudi
- h) Witness statement of Steve Merrin
- i) The deposition of Steve Merrin
- j) Witness statement of Chris Middlemiss
- k) Witness statement of Mike Washburn
- l) Witness statement Jason Scott
- m) The deposition of Jason Scott
- n) Crime report and information for May 18th 2010

#### **V. Opinions**

After reviewing all the materials stated herein, in Section IV of this report, it is my opinion that Officer Joshua Patterson, on the day of May 18<sup>th</sup> 2010, did not take the proper safety precautions, considering the intoxication level of Josh Chatwin and being handcuffed, on a concrete surface, as it pertains to the prisoner safety, and did not use the proper arrest control tactics, weapon retention tactics, and use of force, while interacting with an arrestee, as proper law enforcement training would have provided.

It is my opinion, based upon review of the facts presented, the materials referenced in this report and my training and experience, that Officer Patterson used excessive force in executing the arrest of Josh Chatwin, especially in view of the fact that Josh Chatwin was handcuffed behind his back, was intoxicated, and therefore unsteady on his feet.

It is also my opinion, that Officer Patterson failed to use proper procedures that are designed to ensure the safety of the officers and an arrestee, who is handcuffed and intoxicated.

It is my further opinion, that the training provided by Draper City to its officers concerning the proper procedures to execute the arrest of a handcuffed/intoxicated individual was completely inadequate.

In Officer Joshua Patterson's deposition, Officer Patterson admits to receiving training in the Utah State Police Officer's Standards and Training (POST) on a "proper search". Officer Patterson testifies to, "all the techniques of doing a safe search, of officer safety, of suspect safety". Officer Patterson's deposition he states, "It's mostly procedures of incoming suspect standing, kneeling prone, techniques to use for your safety, techniques to use for their safety". In this case, were the proper precautions taken towards the "suspect safety"?

It is my opinion that the proper safety precautions, for the officers and suspect, were not taken into consideration. In Officer Patterson's deposition, he testifies that due to the intoxication level of Josh Chatwin, he has to hold Josh Chatwin up, so he doesn't fall and hit the ground. Officer Patterson testifies to his knowledge of performing a "search incident to arrest" of individuals who are standing, kneeling, and prone. Officer Patterson also testifies to moving Josh Chatwin to Officer Harris' patrol truck, in an attempt to keep Josh Chatwin in a standing position. In my opinion, the proper safety precautions, when dealing with a heavily intoxicated person, would be to put them into kneeling or prone position, and consider the surface in which the search is being conducted, where the arrestee was not a risk of falling during the search. In my opinion, moving Josh Chatwin next to Officer Harris' patrol truck to conduct a search of his person puts Josh Chatwin at a greater risk of injury, if he does fall, because Officer Harris' patrol truck is located on concrete.

According to depositions from the officers, Josh Chatwin is constantly swaying and barely able to keep his own balance, yet Officer Patterson is the only officer, out of 3 officers on scene, dealing with Josh Chatwin. Officer Harris performs an inventory search of Josh Chatwin's vehicle and leaves Officer Patterson to search and secure Josh Chatwin. There is no urgency to search a vehicle with no other occupants, prior to searching and securing an arrestee. In my opinion, Officer Harris either felt that Officer Patterson was capable of securing Josh Chatwin himself, or Josh Chatwin was not a credible threat to the officer's safety.

Officer Baugh testified in her deposition that she was on scene to assist with this incident, yet Officer Baugh has only attended the National Animal Control Academy (NACA). Officer Baugh has been trained with the use of an ASP, pepper spray, and Taser, as it relates to animals. According to Officer

Baugh's deposition, she states that she works for the Draper City Police Department and has been ordered, by her supervisor Officer Wilson and Chief Mac Connole, to assist with police calls for service, even if they don't relate to an animal issue. Officer Baugh testifies that she has not attended the Utah Police Officer Standards and Training (POST) certification courses, nor had any formal training from the Draper City Police Department. Officer Baugh testified if someone aggressive came toward her that, "That is when my Taser would come handy, I am assuming", although Officer Baugh has not been certified in the use of a Taser against a person. In my opinion, Officer Baugh has been ordered to assist with law enforcement issues, when she has not been trained or certified to handle these types of calls.

Officer Baugh testifies to being present and observing this incident. Officer Baugh observes Josh Chatwin's fingers touching the front of Officer Patterson's duty belt, but does not observe Josh Chatwin attempt to remove Officer Patterson's duty weapon. Officer Baugh also does not hear the retention lock release on Officer Patterson's holster.

Officer Patterson testifies that he heard the retention lock on his duty holster unlock and see that Josh Chatwin has three fingers on his duty weapon. Officer Patterson also testified that he had a hold of the handcuffs, on Josh Chatwin, with his left hand. Officer Patterson then places his right hand on Josh Chatwin's bicep and "moves" him to the ground. At this same moment, Josh Chatwin becomes completely limp, falls to the ground, and hits his head on the concrete. In my opinion, proper weapons retention tactics, taught in local, state, and federal law enforcement, teaches you to place your hand on top of a suspect's hand, which is attempting to remove the duty weapon and push down, in an attempt to keep the weapon in the holster. The second part of these tactics, would be to move the duty weapon away from the threat and perform other soft hand techniques (i.e., wrist locks, twist locks, pain compliance, etc.) to break away the suspect's hold on the weapon. In my opinion, while Josh Chatwin is handcuffed, this not only restricts his ability to injury himself or others, but the handcuffs can be used to assist in twist lock controls. In my opinion, by moving Josh Chatwin away, turning him approximately 270 degrees away, while handcuffed and while he allegedly had a hold of the Officer Patterson's duty weapon, without the retention lock engaged, would allow the weapon to come out of the holster. This would in turn cause a greater threat to the officers, suspect, and bystanders. It is my opinion, that the fact that Josh Chatwin is in handcuffs, this in itself should be a safety consideration, before throwing him to the ground. Josh Chatwin does not have the ability to stop himself from falling or grab on to anything, because his hands are handcuffed behind his back. It is also my opinion, that if Officer Harris had been assisting in restraining Josh Chatwin, while Officer Patterson performed the search of Josh Chatwin's person, the injury to Josh Chatwin would have been avoided.

According to the witness statement of Kathy Torrence, she observes the entire incident on May 18<sup>th</sup> 2010. Kathy Torrence observed two officers take Josh Chatwin into custody, while they were located on a grassy area. Kathy Torrence observes the two officers conduct a search of Josh Chatwin's person, while on the grassy surface. One officer (Officer Harris) goes to Josh Chatwin's vehicle (to perform an inventory search), while the other officer (Officer Patterson) moves Josh Chatwin to a patrol truck located in the driveway. At this point, Officer Patterson throws Josh Chatwin to the ground, causing significant bodily injury to Josh Chatwin's head. In my opinion, according to Kathy Torrence's written statement, testimony at preliminary hearing, and deposition, two officers used the proper procedures, when initially taking Josh Chatwin into custody. Two officers assisted with placing Josh Chatwin in handcuffs. A search incident to arrest, was conducted on Josh Chatwin's person, by two officers, but Officer Harris leaves Officer Patterson to secure Josh Chatwin alone. In my opinion, if Josh Chatwin was resisting arrest and/or an unruly individual, Officer Harris should have assisted with securing Josh Chatwin safely in the patrol truck.

## **VI. Methodology**

The methodology used in coming to my opinions is standard methodology used by someone with my training and experience in evaluating the force used in an arrest, is the methodology generally accepted by my peers in the law enforcement community and is in accordance with standard, recognized, proper law enforcement procedures used by police departments, domestic and international, to determine whether an arrest was made with force under the circumstances.

## **VII. The Reasons and Bases for my Opinions**

The reasons and bases for my opinions are:

- a) The materials examined
- b) My years of experience as a law enforcement officer and instructor
- c) My knowledge of use of force training, procedures, and evaluations
- d) My publications, training curriculum, and policies, ensuring the safety of officers, suspects, and bystanders.



### **VIII. Conclusion**

My opinions, included in Section V, are that Officer Patterson did not take the proper officer/suspect safety precautions and did not use proper arrest control or weapons retention tactics on May 18<sup>th</sup> 2010. Officer Patterson used excessive force against Josh Chatwin. Officer Patterson, Officer Harris, and Office Baugh did not use the proper techniques or training to protect Josh Chatwin, an intoxicated individual, on concrete, in handcuffs and in custody, further described as a "prisoner" as defined in the Utah Code Annotated.

My opinions also include the fact that Officer Patterson and Officer Baugh, both employees with the Draper City Police Department on May 18<sup>th</sup> 2010, both testified that they either did not recall use of force training being provided to them by Draper City or they had never received use of force training, as it pertains to an intoxicated person.

A handwritten signature in blue ink, appearing to be "K. Patterson", written over a horizontal line.

Signature

A handwritten date in blue ink, "1/14/15", written over a horizontal line.

Date



**ADDENDUM TO EXPERT REPORT OF TREVOR PETERSEN**

I may use the documents produced by the defendants in this case including all documents produced and referenced by Deputy Chief John Eining in the 30(b)(6) deposition of Draper. I may also use illustrations/drawings/photographs of the location of the arrest in my testimony and illustrations/"mock ups"/photographs of ex-Officer Patterson's handcuffs, gun and holster used in the arrest of Mr. Chatwin. I will refer to the Draper City's policies and procedures on the use of force in effect in 2010 and 2013 in addition to the other records produced in this case. I may refer to training documents produced by Defendants on the use of force by police officers upon arrestees during that time. I may use visual aids/real evidence of ex-Officer Patterson's handcuffs, gun (unloaded) and holster used in the arrest of Mr. Chatwin. I may also use a summary chart to explain or illustrate my opinions and conclusions. I will demonstrate the methods ex-Officer Patterson should have used to affect the arrest of Mr. Chatwin without causing harm to Mr. Chatwin or to ex-Officer Patterson.

5693 S. Redwood Rd. #13 Taylorsville, Utah, 84123 ~ 801.430.2047 ~ trevor@privateopsut.com

### **Trevor B Petersen**

Bi-lingual (English/French), seasoned, law-enforcement professional with demonstrated accomplishments in many aspects and experience in diverse, harsh climates. Organized, highly motivated, and detail directed problem solver. Demonstrated ability to work collaboratively with individuals at all levels. Exhibits high integrity, professionalism and respect for diversity. Solid background in military, police, security specialization, and well-developed analytical skills. Shows pride in work and in achievements. Demonstrates professional competence and mastery of subject matter and is conscientious and efficient in meeting commitments, observing deadlines and achieving results; is motivated by professional rather than personal concerns; shows persistence when faced with difficult problems or challenges. Remains calm in stressful situations. Takes responsibility for incorporating gender perspectives and ensuring the equal participation of women and men in all areas of work. Decisive and detail-oriented specialist. Effective communicator; uses superior interpersonal skills to gain trust and build strong relationships with volunteers, staff, and administration. Expertise in:

~ Special Weapons and Tactics ~ Close Protection Operations ~ Firearms Instruction ~ Internet Crimes Against Children ~ Drug and Narcotics ~ Homicide and Gang Task Force ~ White Collar Crimes ~ Training Strategies & Facilitation ~ Undercover Operations ~ Marine Navigation and Enforcement ~

### **Selected Achievements**

- Director of Investigations- Cyber OPS, a Division of Court OPS Inc.
- Secret security clearances with the Department of State and Department of Defense
- SWAT Assistant Team Leader for the United Nations - 1 year
- Subject Matter Expert (SME) digital forensics, (LEP) Engility Corporation - 1 year
- Weber Metro SWAT Entry Squad Leader - 4 years
- Ogden Metro SWAT - 4 years
- Weber / Morgan Homicide Task Force - 2 years
- Ogden / Weber Metro Gang Unit - 4 years
- Internet Crimes Against Children Task Force (ICAC) - 3 years
- Utah White Collar Crimes Task Force - 2 years
- Weber County Use of Force committee - 3 years
- Kane County Narcotic Strike Force - 2 years
- Utah State Parks and Recreation (Marine Enforcement) - 1 year

### **Professional Accomplishments**

- Certificate of Excellence – 4<sup>th</sup> Brigade 3<sup>rd</sup> Infantry Division, United States Army (2013)
- Letter of Commendation – Weber County Sheriff's Office (2009)
- Awarded Deputy of the Year – Weber County Sheriff's Office (2010)
- Letter of Dedication and Commitment – Kanab Police Department Chief, Doug Crosby (2001)
- Computer forensics certifications
- Intermediate Emergency Medical Technician certification (2001)
- Numerous awards of excellence
- Multiple letters of appreciation

## **Professional Experience**

**Cyber OPS**, Taylorsville, Utah- *Cyber OPS, a Division of Court OPS Inc., is a Salt Lake City based company, specializing in computer and digital forensics.*

### **Director of Investigations**

**December 2015- Present**

As a licensed private investigator in the State of Utah specializing in data mining, responsible to lead investigations needing an expert in digital forensics, law enforcement operations, use of force, digital evidence preservation, and Search Techniques for On-site Preview (STOP) forensic tools. Experienced knowledge of digital forensic software programs such as Forensic Tool Kit (FTK), Encase, OS Triage, and Image Scan, which provide a competitive advantage and differentiates from other PI firms. Expert knowledge and experience with the Celebrite Universal Forensic Extraction Device (UFED), which specializes in digital forensics involving cellular/mobile devices. Knowledge and experience with criminal and civil law and procedures, court testimony, interview and interrogation supporting key clients as an expert in their cases.

**Court OPS Inc.**, Taylorsville, Utah- *Court OPS is a Salt Lake City based company specializing in service of civil process.*

### **Private Investigator**

**October 2015- December 2015**

As a licensed private investigator in the State of Utah, conducted surveillance operations, research and locating individuals, acting as personal protection for clients, and civil process service. Conduct background investigations for local police departments, as a third party entity. Document investigations for the client and provide accurate information to support decision making and litigation.

**Snowbasin Resort**, Huntsville, Utah- *Snowbasin is a world class ski resort located 33 miles northeast of Salt Lake City who hosted the 2002 Winter Olympic alpine skiing races for downhill, combined, and super-G.*

### **Security Officer**

**September 2015 to October 2015**

Worked as a security officer, ensuring the safety of patrons, entertainers, and employees. Conducted area patrols to prevent theft or damage to the property and investigations when needed. Documented and reported findings to leadership to support improvements in day to day operations.

**DynCorp International (UNPOL)**, Fort Worth, Texas – *The DynCorp International team combines extensive real-world experience with resourceful, innovative planning to support mobilization, operational readiness, sustainment and development worldwide.*

### **Police Advisor II (SWAT) Assistant Team Leader**

**April 2014 to May 2015**

Worked in Haiti under the Criminal Justice Program Support (CJPS) and in partnership with the United Nations in MINUSTAH, which is the United Nations Stabilization Mission in Haiti. Responsible for the coordination of the Special Weapons and Tactics (SWAT) Unit while providing training, mentoring, and supporting the Jordanian and Haitian SWAT teams.

As the assistant team leader, I observed “day to day” operations. Ensured everyday reports were completed and submitted to chain of command. Coordinated and approved vacation leave. Communicated with senior officials within the United Nations and Haitian National Police. Planned, executed, and evaluated tactical operations. Wrote operational orders and tasked individual responsibilities. Conducted training courses including, but not limited to; firearms, chemical agents, less-lethal munitions, physical fitness, rappelling, hostage rescue, dignitary/personal protection, Tactical Emergency Medical (TEMS), cover and support, dynamic entry techniques, scouting/recon, breaching, use of force, and emergency management. Worked as a fulltime firearms instructor for SWAT and other specialized Haitian police units.

- Planned and supervised close protection details for Senior United Nations officials and dignitaries.

***Engility Corporation, Alexandria, Virginia ~ Deploy the resources and specialized services with efficient and effective approaches focused on providing precisely the services needed at the best possible cost. Subject matter experts power a portfolio of capabilities aligned with the changing priorities of the U.S. Government.***

#### **Law Enforcement Professional**

**October 2012 to December 2013**

As a Law Enforcement Professional (LEP) in Afghanistan, served as trainer / mentor with the United States Army. Responsibilities were to train and mentor U.S. forces and the Afghanistan National Police. Main priorities of instruction included DNA collection and tactical site evidence (TSE) collections, post blast analysis, detainee operations, provide instruction in latent fingerprint collection, cell phone exploitation (CELLEX), document and media exploitation (DOMEX), tactical questioning, rule of law, criminal law procedures, and investigative techniques. Used deductive reasoning to make decisions in high stress situations. Worked collaboratively with colleagues to achieve organizational goals. Solicited input by genuinely valuing others' ideas and expertise.

Worked as a part of a Quick Reaction Force (QRF), where I was available 24/7. Worked under extremely hostile and stressful conditions.

- Served as a Subject Matter Expert (SME) in digital forensics and biometric data collection
- Trained US soldiers to use the Universal Forensic Extraction Device (UFED) to extract digital intelligence data from cellular phones and computers
- Assisted in operations involving weapons caches, locating High Value Targets (HVT), and Battle Damage Assessments (BDA)
- Assisted, trained, and mentored Afghanistan police with interviewing and interrogation, intelligence gathering, detainee operations, and other investigation techniques

***Weber County Sheriff's Office, Weber County, Ogden, Utah ~ The Mission of the Weber County Sheriff's Office is to provide a safe environment for life and property within Weber County through quality service.***

#### **Detective (ICAC)**

**November 2009 to October 2012**

As a full-time member of the Internet Crimes Against Children Task Force (ICAC), primary responsibilities were to proactively search for sexual predators on the Internet. Working with the Federal Bureau of Investigations (FBI), used software programs to search for Secure Hash Algorithms (SHA) values of known digital files that contained child pornography shared through Peer to Peer (P2P) files over the Internet. Worked undercover in Internet chat rooms, posing as an underage female, in an attempt to identify sexual predators. Drafted and executed search warrants for information and evidence as it pertained to the location of an Internet Protocol (IP) address, physical location (home or business), and the contents of computer hard drives, cellular phones, and/or Internet accounts.

Proficient computer forensic analyst with FTK, Encase, WinHex, and UFED/Cellex. Certified in basic data recovery and acquisition (BDRA), windows internet trace evidence (INET), intermediate data recovery and analysis (IDRA), NT operating systems (NTOS), NT file systems (NTFS), and secure techniques for onsite preview (STOP).

- In 2010, I received the Deputy of the Year award for my work as an Internet crimes investigator
- Achieved a 100% conviction rate with my investigations
- Demonstrated results through a 98% confession rate with my interviews and/or interrogations
- Certificate of Appreciation from the Utah Attorney General's Office
- Secured and managed grant funds from the Department of Justice
- Instructed computer crimes classes to several law enforcement agencies, as well as, university students
- Developed Standard Operating Procedures (SOP) for the Weber County Sheriff's Office policy manual on handling computer crimes
- Worked as certified instructor for the Utah Police Officer's Standards and Training Academy (POST)

**SWAT Entry Squad Leader (Collateral Duty)****November 2008 to October 2012**

As an entry squad leader for the Weber Metro SWAT team, responsible for operation coordination, planning, intelligence gathering, execution, and after action reporting while supervising a squad of 7-9 SWAT members. At times, also served as the Operations Officer and/or Team Leader.

Duties included the planning and execution of operations such as high risk warrant service, hostage rescue, dignitary/personal protection, barricaded/suicidal subjects, open area searches, and armed/violent persons. Recognize and evaluate the seriousness of threats. Coordinate close protection operations and ability to effectively deal with stress factor when encountered in security management and close protection operations. Develop clear goals that are consistent with agreed strategies. Identify the priority activities and assignments. Adjust priorities as required. Allocate appropriate amount of time and resources for completing work; while foreseeing risks and allow for contingencies when planning. Monitor and adjust plans and actions as necessary and use time efficiently. Speak and write clearly and effectively. Listen to others and correctly interpret messages from others and respond appropriately. Ask questions to clarify, and exhibit interest in having two-way communication. Tailor language, tone, style and format to match audience. Demonstrate openness in sharing information and keeping people informed. Work collaboratively with colleagues to achieve organizational goals and solicit input by genuinely valuing others' ideas and expertise. Willing to learn from others. Place team agenda before personal agenda and support and act in accordance with final group decision, even when such decisions may not entirely reflect own position. Share credit for team accomplishments and accept joint responsibility for team shortcomings.

Worked as a firearms instructor, live fire shoot house instructor, and range safety officer.

- Planned and executed a close protection operation for Utah Senator Orin Hatch
- Trained and mentored several SWAT operators from different states and countries, such as Mexico, England, and Mongolia
- Attended and obtained certifications in several areas such as SWAT operations, planning, and management, Less-lethal munitions instructor, and FBI firearms instructor certification
- Trained with elite military units

**Financial Crimes Investigator****November 2007 to November 2009**

Responsibilities included investigating white collar crimes such as; fraud, identity theft, forgery, and embezzlement. Investigated both individuals and active criminal enterprise (organized crime). Active participant in a statewide task force which involved several law enforcement agencies, both local and federal. Experience drafting and executing search warrants and investigative subpoenas. Through the assistance of technology, tracked Internet Protocol (IP) addresses to locate individuals using the Internet to commit identity/credit card fraud. Through the assistance of hand writing analysis training, identified suspects in forgery and/or embezzlement cases.

- Lead investigator in a high profile forgery case involving a Utah State court employee resulting in a successful conviction.
- Lead investigator in a high profile forgery/embezzlement case involving a Utah State Department of Prisons employee resulting in a full and successful conviction. Recovered over \$70,000 of stolen funds.
- Received a Letter of Commendation for thorough investigations and conviction rate
- During my 5 years as an investigator, I also was assigned to the Ogden Metro Gang Unit and responsible for investigating organized crime involving violent street gangs. Assigned to the Weber/Morgan Homicide Task Force where I was responsible for investigating homicides and an officer involved shooting that occurred in Weber and Morgan Counties.
- Used Global Positioning System (GPS) through a cellular phone to locate a homicide suspect who also had his wife hostage. Suspect was apprehended and victim was not harmed / injured. Personally commended on my knowledge and expertise in this case.
- Conducted a use of force and attempted homicide investigation, which involved an officer involved shooting with a different law enforcement agency. The officer was severely injured in this incident and survived. I was commended by the Grand County Attorney's Office and Grand County Sheriff's Office for diligence in this case.

**SWAT (Collateral Duty)****September 2004 to November 2008**

As a member of the SWAT entry squad, conducted several operations including, but not limited to: high risk warrant service, barricaded/suicidal subjects, dignitary protection, and armed/violent persons. Excellent knowledge of close protection technique combined with a solid background of military, police or security specialization. Well-developed analytical skills and able to recognize and evaluate the seriousness of threats. Show pride in work, in achievements, demonstrates professional competence, and mastery of subject matter. Conscientious and efficient in meeting commitments, observing deadlines and achieving results. Motivated by professional rather than personal concerns and show persistence when faced with difficult problems or challenges. Remain calm in stressful situations. Takes responsibility for incorporating gender perspectives and ensuring the equal participation of women and men in all areas of work.

**Deputy (Patrol)****May 2002 to November 2007**

Responsible for responding to calls for service, conducting proactive patrols of residential and business areas, providing emergency medical services, traffic accident investigations, community policing, serving arrest warrants, traffic enforcement, drafting complete and accurate reports, and court testimony.

- Worked as a Field Training Officer (FTO) training, coaching, and evaluating new deputies.
- Served as an instructor at the Utah State Police Officer's Standards and Training academy.

***Kane County Sheriff's Office, Kanab, Utah ~ Law enforcement office located in Southern Utah which serves Lake Powell and the Grand Staircase National Monument.***

**Narcotics Investigator****September 2000 to May 2002**

Responsibilities included conducting narcotics investigations some of which included undercover roles as a student in local high schools. Conducted narcotic investigations involving possession, distribution, manufacturing, and trafficking and worked with confidential informants and conducted "controlled buy" operations. Extremely proficient with primitive and cellular base surveillance techniques.

- Worked undercover, as a student, in 7 different high schools in Utah. These operations resulted in over 30 felony distribution arrests, 3 distribution locations, 2 methamphetamine laboratories, and 1 trafficking ring.
- During an undercover operation, in a high school, identified a high school teacher who was cultivating and distributing marijuana to high school aged children.
- Partnered closely with the Drug Enforcement Administration (DEA) with locating and seizing large shipments of illegal narcotics being trafficked from Mexico through Utah.

***Utah State Parks & Recreation, Lake Powell, Utah ~ Manage 43 state parks — from Bear Lake State Park at the Utah/Idaho border to Edge of the Cedars State Park Museum deep in the Four Corners region, and everywhere in between. Administer the Utah off-highway vehicle, boating, and trails programs. Provide access to waterways and trails, and promote education, safety, and resource protection.***

**Marine Enforcement Ranger****March 2000 to September 2000**

Provided marine enforcement, emergency medical services, and search and rescue on Lake Powell, as a marine enforcement ranger. Conducted boat accident investigations, enforced boating laws, and instructed personal watercraft safety courses. Worked with federal, state, and local law enforcement that provided law enforcement services on Lake Powell.

- Received several letters of appreciation from visitors at Lake Powell, Utah
- Commended for my professionalism by the National Park Service

---

### **Education**

Fox Valley College – Fall 2010  
Southern Utah University – Summer 2001  
Utah Law Enforcement Academy – POST, CAT 1 February 2000  
Utah Law Enforcement Academy – POST, CAT II, March 1999  
Weber State University- Spring of 1999 and Fall of 1999  
Bear River High School, Utah- 1995

### **Certifications**

Federal Bureau of Investigations (FBI) Firearms Instructor- November 2011  
National Tactical Officer's Association (NTOA) Less-Lethal/Chemical Munitions Instructor- September 2006  
Emergency Medical Technician (EMT)- May 2001  
National White Collar Crimes (NW3C) Digital Forensics Subject Matter Expert (SME)- March 2011  
Utah Public Safety Instructor- November 2004  
Utah Public Safety Field Training Officer- August 2004  
Swanson's Tactical Training Center Range Safety Officer- July 2010